

REMARKS

Claims 1 through 6 are currently pending in the application.

This amendment is in response to the Office Action of September 27, 2004.

Preliminary Amendment

Applicant notes the filing of a Preliminary Amendment on April 12, 2004, which filing was not acknowledged in the outstanding Office Action. Should the Preliminary Amendment have failed to have been entered in the Office file, Applicant will provide a true copy to the Examiner.

35 U.S.C. § 102(b) Anticipation Rejections

Anticipation Rejection Based on Wojnarowski et al. (U.S. Patent 5,104,480)

Claims 1 through 6 were rejected under 35 U.S.C. § 102(b) as being anticipated by Wojnarowski et al. (U.S. Patent 5,104,480).

Applicant asserts that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

After considering the cited prior art, the rejection, and the Examiner's comments, Applicant has amended the claimed inventions to clearly distinguish over the cited prior art.

Turning to the Wojnarowski et al. reference, described is a laser ablation process substantially roughening the surface of polymer dielectrics on metal layers and used to repair open traces in printed circuit structures.

Applicant asserts that the Wojnarowski et al. reference does not and cannot anticipate the presently claimed inventions of presently amended independent claims 1, 3, and 5 under 35 U.S.C. § 102 because the Wojnarowski et al. reference does not identically describe, either expressly or inherently, the elements of the inventions in as complete detail as is contained in the claims. For instance, Applicant asserts that the Wojnarowski et al. reference does not describe

the elements of the presently claimed inventions of presently amended independent claims 1, 3, and 5 calling for “scanning the substrate for irregularities for removal”, “roughening the surface of the substrate for removal of irregularities”, and “roughening the surface of the substrate while removing irregularities”. In contrast to the presently claimed inventions of presently amended independent claims 1, 3, and 5, the Wojnarowski et al. reference merely describes the ablation of polymer coatings on metal layers for the formation of circuits. Such is not the presently claimed inventions.

Therefore, presently amended independent claims 1, 3, and 5 are allowable as well as dependent claims 2, 4, and 6 therefrom.

Anticipation Rejection Based on Eichelberger et al. (U.S. Patent 4,894,115)

Claims 1 through 6 were rejected under 35 U.S.C. § 102(b) as being anticipated by Eichelberger et al. (U.S. Patent 4,894,115).

Applicant asserts that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

After carefully considering the cited prior art, the rejections, and the Examiner’s comments, Applicant has amended the claimed invention to clearly distinguish over the cited prior art.

Turning to the Eichelberger et al. reference, described is a process for forming holes in a desired pattern in a polymer dielectric layer scanned repeatedly with a high energy continuous wave laser.

Applicant asserts that the Eichelberger et al. reference does not and cannot anticipate the presently claimed inventions of presently amended independent claims 1, 3, and 5 under 35 U.S.C. § 102 because the Eichelberger et al. reference does not identically describe, either expressly or inherently, the elements of the inventions in as complete detail as is contained in the claims. For instance, Applicant asserts that the Eichelberger et al. reference does not describe the

elements of the presently claimed inventions of presently amended independent claims 1, 3, and 5 calling for “scanning the substrate for irregularities for removal”, “roughening the surface of the substrate for removal of irregularities”, and “roughening the surface of the substrate while removing irregularities”. In contrast to the presently claimed inventions of presently amended independent claims 1, 3, and 5, the Eichelberger et al. reference merely describes the formation of holes in a polymeric dielectric layers. Such is not the presently claimed inventions.

Therefore, presently amended independent claims 1, 3, and 5 are allowable as well as dependent claims 2, 4, and 6 therefrom.

Applicant submits that claims 1 through 6 are clearly allowable over the cited prior art.

Applicant requests the allowance of claims 1 through 6 the case passed for issue.

Respectfully submitted,



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